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Autoliv ASP, Inc.

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

NICOLE THOMPSON, SHIRLEY THOMPSON,
and DENNIS THOMPSON,

Plaintiffs,

vs.

AUTOLIV SAFETY TECHNOLOGY INC., a
Delaware Corporation; TRW AUTOMOTIVE U.S.
LLC, a Delaware Corporation licensed in Nevada,
DOE DEFENDANTS I-X and ROE
CORPORATIONS I-X, inclusive,

Defendants.

Case No. 2:09-cv-01375-PMP-LRL

**SECOND STIPULATED AMENDED
DISCOVERY PLAN AND
SCHEDULING ORDER
REGARDING DAMAGES EXPERT
DEADLINES**

(SECOND REQUEST)

Pursuant to Local Rule 26-4 of the United States District Court of Nevada, Plaintiffs,
Defendant Autoliv ASP, Inc. and Defendant TRW Automotive U.S., LLC hereby submit this
Second Stipulated Amended Discovery Plan and Scheduling Order Regarding Damages Expert
Deadlines, as follows:

The current Discovery Plan and Scheduling Order dated May 12, 2010, (Doc #39) provides, among other deadlines, the following schedule regarding expert disclosures:

Event	Current Deadline
Expert Disclosures	September 16, 2010
Rebuttal Expert Disclosures	November 1, 2010

In this Stipulation, the parties request a limited extension of the current deadlines for damages/causation/medical related experts. The parties do not request any other changes to the current Scheduling Order. To date the parties have been diligently engaging in pretrial discovery. These are some of discovery tasks undertaken to date¹:

- The parties have exchanged Fed. R. Civ. P. 26(a)(I) Initial Disclosures.
- Plaintiffs provided supplemental Fed. R. Civ. P. 26(a)(I) Initial Disclosures.
- Plaintiffs responded to written discovery requests from TRW and Autoliv.
- Defendants TRW and Autoliv ASP responded to written discovery requests from Plaintiffs.
- Defendant TRW has served non-party subpoenas on several of Plaintiffs' medical providers to obtain updated medical records.
- Defendant Autoliv ASP served a non-party subpoena on Chrysler Group and obtained documents in response related to the previous litigation brought by Plaintiff against Chrysler arising out of the same incident.
- Defendant Autoliv ASP served non-party subpoenas to obtain employment and education records related to Plaintiff Nicole Thompson.
- Defendants TRW and Autoliv ASP deposed each of the Plaintiffs.
- Plaintiffs deposed a Rule 30(b)(6) representative of Autoliv ASP
- Plaintiffs deposed a Rule 30(b)(6) representative of TRW.

¹ By listing these tasks, no party hereby stipulates to the completeness of any other party's discovery responses, including depositions.

Despite those diligent efforts, the parties agree that additional discovery remains to be completed, including but not limited to obtaining complete updated medical records pertaining to Plaintiffs' treatment. Plaintiffs recently indicated that there are additional medical providers from which records have not yet been obtained. It is unclear exactly when those records will be produced by the medical providers. In light of these circumstances, Plaintiffs and Defendants agree that additional time is necessary to prepare and furnish damages, causation and medical-related expert disclosures. Accordingly, the parties request the Court enter an Amended Scheduling Order that extends the expert disclosure dates for damages/causation/medical-related experts as follows:

Event	Previous deadlines	New deadlines for damages/causation/medical experts only
Expert Disclosures	September 16, 2010	October 22, 2010
Rebuttal Expert Disclosures	November 1, 2010	December 7, 2010

The parties do not request any changes to the current deadlines for any other experts, including all liability experts. Thus, initial expert disclosures for liability experts will still be due September 16, 2010, and rebuttal liability expert disclosures will still be due November 1, 2010. All other deadlines in the May 12, 2010, Stipulated Discovery Plan and Scheduling Order remain unchanged.

These modifications to the current Scheduling Order are not sought for the purpose of delay or to frustrate the progress of this case, and are sought only to give all parties a limited amount of additional time to coordinate and complete the necessary discovery to prepare and present damages/causation/medical expert witness disclosures in this case. As the court has not yet set a trial date in this case, permitting the parties the above limited extensions to the current

Scheduling Order will neither interfere with any existing pre-trial obligations nor delay the progress of this case for trial. IT IS SO STIPULATED.

EDWARD J. ACHREM & ASSOCIATES

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IT IS SO ORDERED this 3rd day of Sept., 2010.



UNITED STATES MAGISTRATE JUDGE